

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

SUSAN HONEYCUTT,

Defendant.

DOC #:

DATE FILED: 08/28/2008

08 Cr.

COUNT ONE

The United States Attorney charges:

1. From at least in or about January 2003, up to and including on or about June 18, 2008, in the Southern District of New York and elsewhere, SUSAN HONEYCUTT, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1028(a)(2) of Title 18, United States Code, Title 8, United States Code, Section 1324(a)(1)(A)(ii), and Title 18, United States Code, Section 2.

2. It was a part and object of the conspiracy that SUSAN HONEYCUTT, the defendant, and her conspirators, unlawfully, willfully and knowingly, would and did transfer and cause to be transferred false identification documents, knowing such documents were produced without lawful authority in violation of Title 18, United States Code, Section 1028(a)(2).

3. It was a further part and object of the conspiracy

that SUSAN HONEYCUTT, the defendant, and her conspirators, unlawfully, willfully and knowingly, would and did with reckless disregard of the fact that an alien has come to, entered and remains in the United States in violation of law, did transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and Title 18, United States Code, Section 2.

Overt Acts

4. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 31, 2008, two co-conspirators ("CC-1" and "CC-2"), spoke over the telephone about CC-1 driving an illegal alien ("Individual-1") to North Carolina to get Individual-1 a fraudulent North Carolina driver's license.

b. On or about March 31, 2008, CC-1 drove from Queens, New York, through the Bronx, New York, to New Jersey, where he picked up Individual-1, on their way to North Carolina.

c. On or about April 1, 2008, CC-1 and Individual-1 each obtained a fraudulent North Carolina driver's license from SUSAN HONEYCUTT, the defendant, at a North Carolina Department of Motor Vehicles office in Albermarle, North Carolina.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

5. As a result of committing the foregoing offenses alleged in Counts One of this Information, SUSAN HONEYCUTT, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting or derived from proceeds obtained directly or indirectly as a result of violating Title 18, United States Code, Section 371.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(I) cannot be located upon the exercise of due diligence;

(ii) has been transferred or sold to, or deposited with, a third person;

(iii) has been placed beyond the jurisdiction of the Court;

(iv) has been substantially diminished in value;

or

(v) has been commingled with other property which

cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to 18 U.S.C.
§ 982(b), to seek forfeiture of any other property of said
defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United
States Code, Sections 1028, 1929 and 1930.)

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

